

July 17, 2002

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A-325
Washington, D.C. 20554

Re: Notice of Inquiry Concerning a Review of the Equal
Access and Nondiscrimination Obligations Applicable to
Local Exchange Carriers – CC Docket No. 02-39

Dear Ms. Dortch:

By this letter, NeuStar, Inc, responds to comments and reply comments filed in the above-referenced proceeding concerning the neutral third party (NTP) administration of telecommunications customer information exchange requirements and the customer's preferred carrier choices, changes, and freezes.¹ Commenters advocated the creation of an NTP administrator to maintain a centralized database and a clearinghouse of customer-account information for real-time queries during sales calls and also to administer all customer preferred carrier choices, changes and freezes.² The Commission was requested to initiate a rulemaking proceeding to address the propriety of implementing an NTP

¹ *Notice of Inquiry Concerning a Review of the Equal Access and Nondiscrimination Obligations Applicable to Local Exchange Carriers*, CC Docket No. 02-39, FCC 02-57 (rel. Feb. 28, 2002).

² Comments of AT&T Corp. at 38, CC Docket No. 02-39 (May 10, 2002) (AT&T Comments); *see also*, WorldCom Reply Comments at 2, CC Docket No. 02-39 (June 10, 2002) (WorldCom Reply Comments).

administration system. Commenters also advocated that the FCC create requirements regarding the accurate and timely exchange of customer information using the Customer Account Record Exchange (CARE) standard.³

NeuStar operates the neutral CARE Clearinghouse, which allows any local exchange carrier (LEC) or interexchange carrier (IXC) to exchange customer account records for PIC changes in a timely and accurate manner. More than 500 LECs and IXCs are using NeuStar's CARE Clearinghouse. As the provider of the CARE Clearinghouse, and as the neutral third party administrator of critical infrastructure numbering services such as the North American Numbering Plan, national Thousands Block Number Pooling, and number portability, NeuStar has a unique understanding of the requirements necessary to develop, implement, and maintain an administration service for preferred carrier changes that are accessible by all service providers. Should the Commission decide that creating an NTP administration would be in the best interest of consumers and the industry, NeuStar would be interested in serving as the administrator.

NeuStar understands the issues presented by AT&T and others regarding the difficulty in efficiently determining and lifting the freeze status of a customer's service accounts with its local service provider and has developed solutions targeted at benefiting carriers on a nondiscriminatory basis. NeuStar has been asked to work with state commissions and organizations at the state, regional and national levels regarding the benefits of NTP administration of carrier changes. NeuStar envisions an NTP administration of preferred carrier changes as part of a Carrier-to-Carrier (C2C) Service Center. The NTP

³ AT&T Comments at 39. WorldCom Reply Comments at 2.

preferred interexchange carrier (PIC) administration portion would be designed and operated to administer and maintain records of customers' elementary service information, including presubscribed local, intraLATA toll and interLATA toll service providers. The C2C Service Center would exchange this information among carriers when the customer changed service providers. The service would also include lifting PIC freezes. This approach envisions a centralized and neutral administrator to process and track preferred carrier choices and subsequent changes. The C2C Service Center could also include CARE and other functions, such as the exchange of Customer Service Records (CSRs) among local carriers. It would function as a clearinghouse, which is a one-to-many business model. A clearinghouse business approach operates as a hub and eliminates the need for a telecommunications provider to maintain interfaces with hundreds of other carriers. The clearinghouse model greatly reduces potential delays and operational problems. For PIC administration, the clearinghouse model could enable the long distance carrier to determine the customer's freeze status prior to submitting a carrier change record to the local service provider, and to avoid delays and expense due to rejected PIC change orders. Once a freeze has been identified and the customer has given permission to lift it, the clearinghouse could simplify the lifting of the freeze by providing an indisputable record of the customer's carrier choice. The same can be done for local service freezes. Another aspect of the C2C Center, the CARE Clearinghouse, could streamline and standardize the exchange and processing of CARE records and notifications between carriers, thereby reducing billing errors and providing timely service provider change notifications to all affected carriers. The C2C

Service Center would function in a neutral and evenhanded manner to administer the carrier change process. The C2C Service Center would perform the following functions:

- Exchange customer PIC information and change requests between carriers;
- Provide access to the C2C Service Center for the mechanized transfer of carrier choice information records through diverse network and electronic interfaces;
- Maintain accurate and detailed records that track the processes and procedures employed by the C2C Service Center; and
- Ensure access security and confidentiality of all customer information.

With its unique experience in neutral third party telecommunications database administration and CARE service, NeuStar welcomes the opportunity both to participate in the discussion of requirements for an NTP provider of carrier choice data, as well as to compete for its development, operation and administration.

Respectfully submitted,

Kimberly Wheeler Miller
Director, Regulatory Law and Public Policy
NeuStar, Inc.